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8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA
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12 In the Matter of)	FPPC No. 05/886
)	
13 SERVICE EMPLOYEES INTERNATIONAL UNION)	
14 POLITICAL EDUCATION AND ACTION FUND)	STIPULATION, DECISION and
(SEIU PEA) AND ANNA BURGER,)	ORDER
)	
)	
16 Respondents.)	
)	

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18 Complainant, Mark Krausse, Executive Director of the Fair Political Practices Commission, and
19 Respondents, Service Employees International Union Political Education and Action Fund (SEIU PEA)
20 and Anna Burger, hereby agree that this stipulation will be submitted for consideration by the Fair
21 Political Practices Commission at its next regularly scheduled meeting.

22 The parties agree to enter into this stipulation to resolve all factual and legal issues raised in this
23 matter, and to reach a final disposition without the necessity of holding an administrative hearing to
24 determine the liability of Respondents.

25 Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural
26 rights set forth in sections 83115.5, 11503, and 11523 of the Government Code, and in sections 18361.1
27 through 18361.9 of title 2 of the California Code of Regulations. This includes, but is not limited to, the
28 right to personally appear at any administrative hearing held in this matter, to be represented by an

1 attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the
2 hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge
3 preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

4 It is further stipulated and agreed that Respondents SEIU PEA and Anna Burger violated the
5 Political Reform Act by failing to file a late contribution report, in violation of Government Code
6 section 84203 (3 counts); failing to file an odd-year campaign statement, in violation of Government
7 Code sections 84200.3, subdivision (a)(3) and 84200.4, subdivision (a) (1 count); and failing to file a
8 pre-election campaign statement, in violation of Government Code sections 84200.5, subdivision (e) and
9 84200.8 (3 counts); as described in Exhibit 1, which is attached hereto and incorporated by reference, as
10 though fully set forth herein. Exhibit 1 is a true and accurate summary of the facts in this matter.

11 Respondents agree to the issuance of the decision and order, which is attached hereto.
12 Respondents also agree to the Commission imposing upon them an administrative penalty in the amount
13 of Twenty-One Thousand Eight Hundred Dollars (\$21,800). A cashier's check from Respondents in
14 said amount, made payable to the "General Fund of the State of California," is submitted with this
15 stipulation as full payment of the administrative penalty, and shall be held by the State of California
16 until the Commission issues its decision and order regarding this matter. The parties agree that in the
17 event the Commission refuses to accept this stipulation, it shall become null and void, and within fifteen
18 (15) business days after the Commission meeting at which the stipulation is rejected, all payments
19 tendered by Respondents in connection with this stipulation shall be reimbursed to Respondents.
20 Respondents further stipulate and agree that in the event the Commission rejects the stipulation, and a

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1 full evidentiary hearing before the Commission becomes necessary, neither any member of the
2 Commission, nor the Executive Director, shall be disqualified because of prior consideration of this
3 stipulation.

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5 Dated: _____

Mark Krausse
Executive Director
Fair Political Practices Commission

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9 Dated: _____

Anna Burger, individually and on behalf of
SEIU PEA, Respondents

1 DECISION AND ORDER

2 The foregoing stipulation of the parties “In the Matter of Service Employees International Union
3 Political Education and Action Fund (SEIU PEA) and Anna Burger, FPPC No. 05/886,” including all
4 attached exhibits, is hereby accepted as the final decision and order of the Fair Political Practices
5 Commission, effective upon execution below by the Chairman.

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7 IT IS SO ORDERED.

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9 Dated: _____

10 Liane M. Randolph, Chairman
Fair Political Practices Commission